

## MORVILLO ABRAMOWITZ GRAND IASON &amp; ANELLO P.C.

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November 30, 2022

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**VIA ECF****MEMORANDUM ENDORSED**

The Honorable Gregory H. Woods  
 United States District Judge  
 Southern District of New York  
 Daniel Patrick Moynihan U.S. Courthouse  
 500 Pearl Street  
 New York, New York 10007-1312

Re: United States v. Ivo Bechtiger, et al., 20 Cr. 497 (GHW)

Dear Judge Woods:

This firm represents Daniel Wälchli, the defendant in the above-referenced matter. We write to request that the Court postpone the oral argument currently scheduled for December 2, 2022 at 1:00 p.m. The government consents to this request.

As discussed in our November 17, 2022 letter to the Court, Mr. Wälchli wants to attend the oral argument. Because he resides in Switzerland, he cannot enter the United States without a parole letter authorized by the Department of Homeland Security and issued by the U.S. Embassy in Bern. While we have been in regular communication with the government, and Mr. Wälchli's Swiss counsel has been in contact with the U.S. Embassy in Bern, as of close of business in Switzerland today, the Department of Homeland Security still had not authorized the issuance of the required parole letter. As a result, Mr. Wälchli will be unable to travel to the United States to attend the argument.

We have conferred with the government and the parties respectfully request that the Court reschedule oral argument for January 5, 17, 19-20, 23-24 or 27. If possible, defense counsel would prefer January 17, 19 or 20. Additionally, because one member of the defense team is a Sabbath observer and resides outside of New York City, we respectfully request that, if the Court schedules argument for a Friday, it do so in the morning.

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We are, of course, available to address this application in person or by telephone. Thank you in advance for your consideration of this matter.

Respectfully submitted,

/s/ Jeremy H. Temkin

Jeremy H. Temkin  
Richard F. Albert

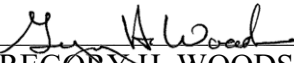
cc: AUSA Olga Zverovich (by ECF)  
SAUSA Nanette Davis (by ECF)  
SAUSA Christopher Magnani (by ECF)

Application granted. The hearing previously scheduled for December 2, 2022, *see* Dkt. No. 57, is hereby adjourned to January 5, 2023, at 2:30 p.m. The hearing will be held in Courtroom 12C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan U.S. Courthouse at 500 Pearl Street, New York, New York, 10007.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 58.

SO ORDERED.

Dated: November 30, 2022  
New York, New York

  
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GREGORY H. WOODS  
United States District Judge